TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE (212) 482-1303 FAX WWW.TALKINLAW.COM EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE: 5100 DORSEY HALL DRIVE SUITE 100 ELLICOTT CITY, MD 21042 410-964-0300 NEW JERSEY OFFICE: 2500 PLAZA 5 HARBORSIDE FINANCIAL CENTER JERSEY CITY, NJ 07311 201-342-6665

October 11, 2021

Honorable Margo K. Brodie United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

BY ECF

Re: <u>United States v. Michael Hlday</u>

20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday ("Hlday") is currently scheduled for a sentencing hearing on October 28, 2021. This letter is respectfully submitted as joint request by the parties to adjourn the sentencing hearing to a date in late December 2021 or early January 2021. As the Court is aware, Hlday has been experiencing significant health issues over the past several months. These health concerns have been a significant impediment to preparation of his sentencing submission. Additionally, the government will be in preparation for a trial that commences on November 1, 2021 and I am scheduled to start a trial in the Supreme Court of the State of New York, Queens County on October 25, 2021. Although the governments trial is more definite, both parties will be concentrating their efforts on trial preparation for the foreseeable near future. The requested adjournment will allow the parties sufficient time to prepare for their impending trials and their respective sentencing submissions and presentations in the instant case.

Thank you for Your Honor's continued patience and consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Sarah Evans (by ECF) AUSA Nicholas Moscow (by ECF)